

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

J.V. (A MINOR) BY HER GUARDIAN AD LITEM  
JUAN VALDEZ, AND JUAN VALDEZ, NORA  
VALDEZ, INDIVIDUALLY, AND B.V. (A MINOR)  
BY HIS GUARDIAN AD LITEM, JUAN VALDEZ,

Plaintiffs,

v.

MACY'S, INC., THYSSEN KRUPP ELEVATOR  
AMERICA, INC., JOHN DOE 1-10 (FICTITIOUS  
NAMES), AND ABC CORP. 1-10 (FICTITIOUS  
NAMES),

Defendants.

Civil Action No.  
2:13-cv-05957

**STIPULATED AMENDMENT TO  
DISCOVERY CONFIDENTIALITY ORDER**

**WHEREAS**, a Discovery Confidentiality Order, Document No. 28, was entered  
in the above-captioned action (the "Confidentiality Order");

**WHEREAS**, there exists a coverage suit entitled Macy's Inc. and Liberty Mutual  
Insurance Company v. Lexington Insurance Company and HDI-Gerling America Insurance  
Company, Docket No. BER-L-20495-14, pending in the Superior Court, Bergen County,  
regarding a claim for coverage by Macy's, Inc. for the above-captioned action (the  
"Coverage Suit");

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** as follows:

1. Liberty Mutual Insurance Company, Lexington Insurance Company, and  
HDI-Gerling America Insurance Company shall be deemed bound and  
parties to the Confidentiality Order;
2. Confidential Documents shall be treated the same and may be used in the

same manner in the Coverage Suit as in the above-captioned action, and the terms "litigation" and "action" shall be deemed to also refer to the Coverage Suit;

3. This Stipulation shall not affect any documents marked confidential by plaintiffs J.V., Juan Valdez, Nora Valdez, and B.V.; and
4. The term "deponent" shall include any witnesses at a trial in the Coverage Suit; and
5. The parties shall use their best efforts to ensure that all documents marked confidential shall be submitted under seal.

**Dated:**

**LESTER SCHWAB KATZ & DWYER**  
Attorneys for Macy's, Inc.

By: 

Robert N. Dunn, Esq.

**JAFFE & ASHER LLP**

Attorneys for Macy's, Inc. and  
Liberty Mutual Insurance Company

By: \_\_\_\_\_

Michael DiCanio, Esq.

**RIKER DANZIG SCHERER HYLAND &  
PERRETTI LLP**  
Attorneys for Lexington  
Insurance Company

By:   


Brooks Leonard, Esq.

Michael Rossignol

**BODELL BOVE LLC**  
Attorneys for HDI-Gerling  
America Insurance Company

By: 

Louis Bove, Esq.

**SHIMBERG & FRIEL, P.C.**  
Attorneys for Defendant ThyssenKrupp  
Elevator Corporation

By: \_\_\_\_\_  
Nancy A. Nolan, Esq.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

J.V. (A MINOR) BY HER GUARDIAN AD LITEM  
JUAN VALDEZ, AND JUAN VALDEZ, NORA  
VALDEZ, INDIVIDUALLY, AND B.V. (A MINOR)  
BY HIS GUARDIAN AD LITEM, JUAN VALDEZ,

Plaintiffs,

v.

MACY'S, INC., THYSSEN KRUPP ELEVATOR  
AMERICA, INC., JOHN DOE 1-10 (FICTITIOUS  
NAMES), AND ABC CORP. 1-10 (FICTITIOUS  
NAMES),

Defendants.

Civil Action No.  
2:13-cv-05957

**STIPULATED AMENDMENT TO  
DISCOVERY CONFIDENTIALITY ORDER**

**WHEREAS**, a Discovery Confidentiality Order, Document No. 28, was entered  
in the above-captioned action (the "Confidentiality Order");

**WHEREAS**, there exists a coverage suit entitled Macy's Inc. and Liberty Mutual  
Insurance Company v. Lexington Insurance Company and HDI-Gerling America Insurance  
Company, Docket No. BER-L-20495-14, pending in the Superior Court, Bergen County,  
regarding a claim for coverage by Macy's, Inc. for the above-captioned action (the  
"Coverage Suit");

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** as follows:

1. Liberty Mutual Insurance Company, Lexington Insurance Company, and  
HDI-Gerling America Insurance Company shall be deemed bound and  
parties to the Confidentiality Order;
2. Confidential Documents shall be treated the same and may be used in the

same manner in the Coverage Suit as in the above-captioned action, and the terms "litigation" and "action" shall be deemed to also refer to the Coverage Suit;

3. This Stipulation shall not affect any documents marked confidential by plaintiffs J.V., Juan Valdez, Nora Valdez, and B.V.; and
4. The term "deponent" shall include any witnesses at a trial in the Coverage Suit; and
5. The parties shall use their best efforts to ensure that all documents marked confidential shall be submitted under seal.

**Dated:**

**LESTER SCHWAB KATZ & DWYER**  
Attorneys for Macy's, Inc.

By: \_\_\_\_\_  
Robert N. Dunn, Esq.

**JAFFE & ASHER LLP**  
Attorneys for Macy's, Inc. and  
Liberty Mutual Insurance Company

By: \_\_\_\_\_  
Michael DiCanio, Esq.

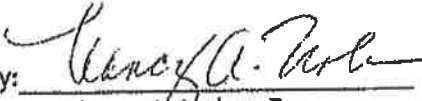
**RIKER DANZIG SCHERER HYLAND &  
PERRETTI LLP**  
Attorneys for Lexington  
Insurance Company

By: \_\_\_\_\_  
Brooks Leonard, Esq.

**BODELL BOVE LLC**  
Attorneys for HDI-Gerling  
America Insurance Company

By: \_\_\_\_\_  
Louis Bove, Esq.

**SHIMBERG & FRIEL, P.C.**  
Attorneys for Defendant ThyssenKrupp  
Elevator Corporation

By:   
Nancy A. Nolan, Esq.